

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION**

**General Synod of The United Church of Christ;
Reverend Joseph Hoffman; Reverend Nancy
Ellett Allison; Reverend Nathan King; Reverend
Nancy Kraft; Rabbi Jonathan Freirich; Reverend
Robin Tanner; Reverend Mark Ward; Reverend
Dr. Nancy E. Petty; Diane Ansley; Catherine
McGaughey; Elizabeth “Lisa” Cloninger;
Kathleen Smith; Shauna Bragan; Stacy Maloney;
Cathy Fry; Joanne Marinaro; Joel Blady; Jeffrey
Addy; Betty Mack; and Carol Taylor;**

Plaintiffs,

v.

**Roy Cooper, Attorney General of North
Carolina; Drew Reisinger, Register of Deeds for
Buncombe County; Wayne Nixon, Register of
Deeds for Cabarrus County; Tonia Hampton,
Register of Deeds for McDowell County; J. David
Granberry, Register of Deeds for Mecklenburg
County; Laura M. Riddick, Register of Deeds for
Wake County; Ronald L. Moore, Buncombe
County District Attorney; Roxann Vaneekhoven,
Cabarrus County District Attorney; Bradley
Greenway, McDowell County District Attorney;
Andrew Murray, Mecklenburg County District
Attorney; and Ned Mangum, Wake County
District Attorney;**

Defendants.

Civ. No. 3:14-cv-213

PLAINTIFFS’ MOTION FOR PRELIMINARY INJUNCTION

Pursuant to Rule 65(a) of the Federal Rules of Civil Procedure, Plaintiffs, through undersigned counsel, respectfully move this Court for a preliminary injunction ordering all Defendants to cease enforcing Section 6 of Article XIV of the North Carolina Constitution, N.C. Gen. Stat. § 51-1 *et seq.*, and any other source of state law that operates to deny same-sex

couples the right to marry in the State of North Carolina, and that operates to threaten clergy with criminal and civil liability through the performance of religious rites that solemnize the union of same-sex couples.

Upon proof of service to all Defendants, Plaintiffs will move the Court for an expedited hearing.

Dated: April 28, 2014

Respectfully submitted,

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ATTORNEYS FOR PLAINTIFFS

CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

/s/ Jacob H. Sussman
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